

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Rio Tinto plc

Plaintiff,

v.

Vale, S.A., Beny Steinmetz, BSG Resources Limited, BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd, BSGR Guinea Ltd. BVI, BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL aka VBG-Vale BSGR Guinea, Frederic Cilins, Michael Noy, Avraham Lev Ran, Mamadie Touré, and Mahmoud Thiam,

Defendants.

Civil Action No. 1:14-CV-03042-RMB-MHD

RIO TINTO PLC'S RULE 26(A)(1) INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), and based upon the information currently and reasonably available to it, Plaintiff Rio Tinto plc (“Plaintiff”), hereby makes the following initial disclosures on Defendants Vale, S.A., Beny Steinmetz, BSG Resources Limited, BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd, BSGR Guinea Ltd. BVI, BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL aka VBG-Vale BSGR Guinea, Frederic Cilins, Michael Noy, Avraham Lev Ran, Mamadie Touré, and Mahmoud Thiam (collectively, the “Defendants”).

A. WITNESSES

Plaintiff identifies the following witnesses as likely to have discoverable information that Plaintiff may use to support its claims and/or defenses in this action, along with their possible subjects of testimony. Plaintiff reserves the right to supplement or amend this witness disclosure

pursuant to Rule 26(e) if additional witnesses or subjects are identified.

No.	Name	Address	Subject
1	Mike Harris Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's research, exploration and development of mining operations at Simandou, negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
2	Marius Verwoerd Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
3	Ken Haddow Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's research, exploration and development of mining operations at Simandou, negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
4	Peter Lello Galassi Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's investigations and studies regarding various port locations related to the development of Simandou.

5	Richard Taylor Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's research, exploration and development of mining operations at Simandou, meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
6	Kerryl Bradshaw Rio Tinto	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
7	Peter Cunningham Rio Tinto	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.

In addition to those individuals identified above, Plaintiff hereby incorporates by reference any witnesses and their possible subjects of testimony disclosed by Defendants in their Initial Disclosure Statements pursuant to Federal Rule of Civil Procedures 26(a).

B. DOCUMENTS

Based on information currently and reasonably available to Plaintiff, set forth below are categories of documents and the location of documents that Plaintiff may use to support its claims or defenses in this action. Plaintiff will produce the identified documents on request at a

mutually agreeable time and place, subject to any necessary protective order or confidentiality designation. Plaintiff reserves the right to use additional documents at trial. Plaintiff further reserves the right to supplement or amend this disclosure pursuant to Rule 26(e) if additional categories of documents are identified.

1. Rio Tinto's research and development of mining operations at Simandou, including but not limited to, geological and technical information, product characteristics, suitable mining methods and drilling operations, processing and logistics including the viability of different transportation options, and the status of efforts to bring Simandou into production.
2. Negotiations between Rio Tinto and Vale related to a potential joint venture at Simandou.
3. The Guinean Government's rescission of Rio Tinto's interest in Blocks 1 and 2 of Simandou and subsequent assignment of that interest to Defendants.
4. The Vale-BSGR joint venture related to Simandou Blocks 1 and 2.
5. Governmental investigations relating to Defendants' acquisition of Simandou Blocks 1 and 2.

The above documents are located at the following Rio Tinto offices: 2 Eastbourne Terrace, London, W2 6LG, United Kingdom 020 7781-2000; 17 place des Reflets, 92097 Paris, La-Défense Cedex, France; 153-158 St. George's Terrace, Perth Australia 6000.

C. DAMAGES COMPUTATION

The amount and type of damages in this matter are undetermined at this time. However, at this time, Plaintiff seeks compensatory, consequential, exemplary and punitive damages, and treble damages pursuant to 18 U.S.C. § 1964(c), as well as attorneys' fees and all costs associated with this matter.

D. INSURANCE AGREEMENTS

Plaintiff is not aware of any insurance agreement whereby an insurance company may be

liable to satisfy all or part of any judgment that may be entered in this matter or be used to indemnify or reimburse payments used to satisfy any judgment.

CONCLUSION

Discovery between the Parties concerning the claims at issue in this matter is not complete. Plaintiffs submit the forgoing Initial Disclosures based on information reasonably available to them and reserve the right to amend or supplement its Initial Disclosures, pursuant to Rule 26(e), as discovery and investigations continue.

Dated: New York, New York
June 23, 2014

Respectfully Submitted,



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Attorneys for Plaintiff Rio Tinto plc

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Rio Tinto plc,

Plaintiff,

-against-

Vale, S.A., Benjamin Steinmetz, BSG
Resources Limited, BSG Resources (Guinea)
Ltd. aka BSG Resources Guinée Ltd, BSGR
Guinea Ltd. BVI, BSG Resources Guinée
SARL aka BSG Resources (Guinea) SARL aka
VBG-Vale BSGR Guinea, Frederic Cilins,
Michael Noy, Avraham Lev Ran, Mamadie
Touré, and Mahmoud Thiam,

Defendants.

Civ. A. No. 1:14-CV-03042-RMB-AJP

VALE S.A.'S RULE 26(A)(1) INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Vale S.A. ("Vale"), by its undersigned attorney, submits the following initial disclosures based on information currently and reasonably available to it.

PRELIMINARY STATEMENT

Although its investigation is ongoing, Vale has made a reasonable and good faith effort to respond to the disclosure requirements of Rule 26(a)(1). The following responses are based on the allegations in Rio Tinto plc's ("Plaintiff" or "Rio Tinto") complaint, dated April 30, 2014 (the "Complaint") and the information and documents known and presently available to Vale at this time after the exercise of reasonable diligence. The responses contained herein are made in a good faith effort to supply such factual information as is presently known, but in no way prejudice Vale's right to supplement this disclosure in relation to further pleading, discovery, review, research or analysis. Vale reserves the right to object to the use – in discovery

proceedings, in trial or for any other purposes – of the information provided herewith based upon relevance, materiality, confidence, privilege, or immunity, or any other objection that may be available to it under applicable rules of law or evidence.

This preliminary statement applies to each and every response provided in this disclosure and is incorporated herein as though fully set forth in all responses that follow.

Without limiting the foregoing, in providing this disclosure, Vale does not intend to waive, but to the contrary intends to preserve, all applicable privileges, including, but not limited to, the attorney-client and work product privileges. Vale expressly reserves the right to amend or supplement these disclosures as appropriate under Fed. R. Civ. P 26(e).

DISCLOSURES

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

In response to Rule 26(a)(1)(A), the following individuals may have discoverable information that Vale may use to support its claims and defenses¹:

Name, Address, Telephone Number	Subject of Information
Eduardo Etchart Vale S.A., Brazil c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000	Negotiations and meetings in 2008 and 2009 between Vale and Rio Tinto with respect to a potential acquisition of various Rio Tinto assets, including Simandou, information and documents provided to Vale during those negotiations and meetings, and Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.

¹ Contact information for persons other than Vale's employees where available has been provided to the best of Vale's information and belief, but may not be up to date.

Name, Address, Telephone Number	Subject of Information
<p>Pedro Rodrigues Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Negotiations in 2008 and 2009 between Vale and Rio Tinto with respect to a potential acquisition of various Rio Tinto assets, including Simandou, and information and documents provided to Vale during those negotiations.</p>
<p>Leonardo Harris Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Negotiations and meetings in 2008 and 2009 between Vale and Rio Tinto with respect to a potential acquisition of various Rio Tinto assets, including Simandou, and information and documents provided to Vale during those negotiations and meetings.</p>
<p>Fabio Masotti Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Negotiations and meetings in 2008 and 2009 between Vale and Rio Tinto with respect to a potential acquisition of various Rio Tinto assets, including Simandou, information and documents provided to Vale during those negotiations and meetings, and technical review of information related to Simandou blocs 1 and 2.</p>
<p>Edson Ribeiro Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Negotiations and meetings in 2008 and 2009 between Vale and Rio Tinto with respect to a potential acquisition of various Rio Tinto assets, including Simandou, information and documents provided to Vale during those negotiations and meetings, and Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.</p>
<p>José Carlos Martins Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Negotiations and meetings in 2008 and 2009 between Vale and Rio Tinto with respect to a potential acquisition of various Rio Tinto assets, including Simandou, information and documents provided to Vale during those negotiations and meetings, and Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.</p>

Name, Address, Telephone Number	Subject of Information
<p>Lucio Cavalli Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Negotiations and meetings in 2008 and 2009 between Vale and Rio Tinto with respect to a potential acquisition of various Rio Tinto assets, including Simandou, information and documents provided to Vale during those negotiations and meetings, and Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.</p>
<p>Marco Barcellos Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Vale's negotiations with BSGR in 2010 with respect to its Simandou joint venture.</p>
<p>Paulo Bergman Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.</p>
<p>Alex Monteiro Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.</p>
<p>Stephen Potter Vale S.A., Brazil</p> <p>c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000</p>	<p>Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.</p>

Name, Address, Telephone Number	Subject of Information
Joao Mendes Vale S.A., Brazil c/o Lewis J. Liman Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 (212) 225-2000	Vale's negotiations with BSGR in 2010 with respect to Vale acquiring an interest in BSGR's Simandou concession.

The following are miscellaneous categories of persons who may have discoverable information that Vale may use to support its claims and defenses:

1. Any person necessary to lay the foundation of any document.
2. Any persons listed in any co-defendant's initial disclosures.
3. Any person listed in Plaintiff's initial disclosures or Plaintiff's responses to any of Vale's interrogatories.
4. Any supervisor and/or employee of any person listed by any party.
5. Any person employed by Plaintiff involved in the negotiations over a possible acquisition by Vale of Rio Tinto assets, including Simandou.
6. Any person employed by Plaintiff involved in making public presentations regarding its Simandou concession.
7. Any person with knowledge regarding the suspension of negotiations between Vale and Plaintiff with respect to Simandou, including but not limited to any person with knowledge of negotiations with Chinalco and BHP Billiton.
8. Any person with knowledge regarding discussions between Plaintiff and the Government of Guinea regarding the development and status of Plaintiff's Simandou concession.

II. DOCUMENTS VALE MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES

Vale has documents, data compilations and/or tangible things in its possession, custody or control that it may use to support its claims or defenses at the following locations:

Vale S.A.
 Av. Graça Aranha
 26 15º andar Centro
 20030 900 Rio de Janeiro RJ
 Brazil

Av. Engº Luiz Carlos Bennini
700/716 – CONJ 51 – Itaim Bibi
São Paulo – SP, 04571-000
Brazil

Rua Paraíba, 1122 – Ed. das Américas – Bairro Funcionários
Belo Horizonte – MG, CEP: 30130-141
Brazil

Rua Sapucaí, 383 – Bairro Floresta
Belo Horizonte – MG, CEP: 30150-904
Brazil

Rua Tapuias, 49 – Bairro Floresta
Belo Horizonte – MG, CEP: 30150-030
Brazil

Av. De Ligação, 3580 – Aguas Claras
Nova Lima – MG, CEP: 34000-000
Brazil

Rodovia Br-381, S/N KM 14 – Bom Destino
Santa Luzia – MG, CEP: 33060-112
Brazil

Vale will provide copies of such documents at the time of their production of documents in response to any requests for documents. Vale reserves the right to supplement this production and to use any documents produced at any time in this action by Plaintiff, any co-defendant, or any third parties.

III. COMPUTATION OF DAMAGES

Vale has not alleged any counterclaims for damages against Plaintiff at this time and, thus, this provision is inapplicable.


IV. INSURANCE

Vale does not have any insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment against Vale, and, thus, this provision is inapplicable.

Dated: July 23, 2014

CLEARY GOTTLEB STEEN & HAMILTON LLP

By:



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